

Relief Requested Without Hearing

UNITED STATES BANKRUPTCY COURT
District of Maine

In the matter of:

STEPHANIE D. BACON
MICHAEL W. BACON

Debtors

Chapter 13
Case No. 10-20494

APPLICATION TO EMPLOY SPECIAL COUNSEL

NOW COME the Debtors Stephanie D. Bacon and Michael W. Bacon, by and through their counsel, Tanya Sambatakos, and files this application to employ special counsel, (“Employment Application”), to represent the Debtor Michael Bacon with respect to a certain employment discrimination claim, as follows:

1. Stephanie W. Bacon and Michael W. Bacon commenced this case with the filing of a voluntary petition for relief under Chapter 13 of the U.S. Bankruptcy Code on April 2, 2010 (the “Filing Date”).

2. On August 20, 2010, the Court entered an order confirming the Debtors’ Chapter 13 plan.

3. On February 3, 2011 the Order Allowing and Disallowing Claims was granted.

4. Payments under the Debtors Chapter 13 plan are on-going.

5. Debtors seek approval of this Court to employ Jonathan M. Goodman, Esq. and the law firm of Troubh Heisler Attorneys at Law, 511 Congress Street, Portland, ME 04104 as

(“Special Counsel”) to investigate and pursue the employment discrimination claim under a contingency fee agreement. In this application, the Debtors seek authority to employ Special Counsel, on a contingency basis, pursuant to the terms of the contingency fee agreement attached hereto as Exhibit A (the “Contingency Fee Agreement”).

6. Special Counsel is well-qualified and experienced in pursuing matters of this nature, and the engagement of Special Counsel will provide a benefit to the Debtors and their estate. In order for the Debtors and their estate to realize the benefit of any personal injury settlement or litigation arising from the Employment Discrimination Claim, the Debtors wish to retain Special Counsel to represent the Debtors with respect to the claims against the potential Defendants.

9. Upon information and belief, Special Counsel represents no interest adverse to the Debtors or the Debtors’ estate, except as otherwise set forth in the signed statements of professional person submitted by Special Counsel herewith.

WHEREFORE, the Debtors pray that the foregoing application be granted and that the Court afford the relief being sought.

Dated: October 17, 2011

Stephanie D. Bacon
Michael W. Bacon

By: /s/ Tanya Sambatakos
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